

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

NATIONAL JOB CORPS ASSOCIATION et al.,     )  
    Plaintiffs,                             )  
   )     Case No. 1:25-cv-04641  
v.   )  
   )  
UNITED STATES DEPARTMENT OF LABOR et al.,     )  
    Defendants.                             )  
\_\_\_\_\_)

COMPLAINT IN INTERVENTION OF JACOB VALINE

Plaintiff-Intervenor Jacob Valine, appearing pro se, respectfully submits this Complaint in Intervention pursuant to Rule 24(c) of the Federal Rules of Civil Procedure.

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**\*\*I. JURISDICTION AND VENUE\*\***

This Court has jurisdiction under 28 U.S.C. § 1331 (federal question); 42 U.S.C. § 12131 et seq. (Americans with Disabilities Act); 29 U.S.C. § 794 (Section 504 of the Rehabilitation Act); and 29 U.S.C. § 3101 et seq. (Workforce Innovation and Opportunity Act).

Venue is proper under 28 U.S.C. § 1391(e) as defendants are federal officials or agencies and the harms alleged occurred within this District and nationwide.

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**\*\*II. STATEMENT OF INTEREST\*\***

Movant is a disabled youth excluded from access to federally funded opportunity programs as a direct result of the Job Corps shutdown and subsequent failure to provide accommodation, transition plans, or accessible alternatives.

No current party represents the interests of disabled youth impacted by this exclusion. Movant seeks intervention to protect these rights and press claims under federal disability law.

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**\*\*III. FACTUAL ALLEGATIONS\*\***

1. Plaintiff-Intervenor was eligible to participate in Job Corps prior to its shutdown.
2. The Department of Labor terminated the program without offering reasonable accommodations or transitional resources for disabled youth.

3. Movant made multiple efforts to access services, education, and career readiness through alternate federally supported pathways but was denied or ignored.
4. The shutdown left thousands of disabled individuals with no access to opportunity despite Congressional mandates under WIOA.
5. Movant has suffered harm including educational disruption, loss of opportunity, systemic exclusion, and emotional distress due to the federal government's failure to uphold statutory obligations.
6. This exclusion continues as of the filing of this Complaint.

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**\*\*IV. CLAIMS FOR RELIEF\*\***

**\*\*Claim 1: Violation of Title II of the Americans with Disabilities Act (42 U.S.C. § 12132)\*\***  
Defendants denied Plaintiff-Intervenor access to a public program operated by a public entity without reasonable accommodation, in violation of ADA Title II.

**\*\*Claim 2: Violation of Section 504 of the Rehabilitation Act (29 U.S.C. § 794)\*\***  
Defendants received federal funds and yet excluded disabled youth from access to services available to others, without offering equivalent alternatives or supports.

**\*\*Claim 3: Violation of the Workforce Innovation and Opportunity Act (29 U.S.C. § 3101 et seq.)\*\***  
The Department of Labor failed to meet statutory obligations to provide career pathways and transition planning for marginalized populations, particularly individuals with disabilities.

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**\*\*V. PRAYER FOR RELIEF\*\***

Plaintiff-Intervenor respectfully requests that this Court:

1. Declare the exclusion of disabled youth from federally funded opportunity programs to be unlawful;
2. Grant injunctive relief requiring the Department of Labor to provide access, accommodation, or transition plans;
3. Order appropriate remedial services to mitigate the harm suffered;
4. Grant such other and further relief as the Court deems just and proper.

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Respectfully submitted,

s/Jacob Valine



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Dated: 07/21/2025